

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

IN RE:

BDC GROUP, INC.,

Debtor.

Case No. 23-00484

**NOTICE OF MOTION FOR ORDER  
TO SHOW CAUSE AND NOTICE  
SETTING BAR DATE FOR  
OBJECTIONS**

TO ZAYO GROUP, LLC, THE DEBTOR, CHAPTER 7 TRUSTEE, ALL CREDITORS AND PARTIES IN INTEREST:

NOTICE IS HEREBY GIVEN that creditor Keystone Savings Bank filed a Motion for Order to Show Cause why Zayo Group, LLC should not be held in contempt ("Motion") in the above-captioned case on February 23, 2024.

NOTICE IS FURTHER GIVEN that objections to said Motion, if any, shall be filed with the Clerk of the Bankruptcy Court, 111 Seventh Avenue SE, Box 15, Cedar Rapids, IA 52401, with a copy to the undersigned attorney, Chapter 7 Trustee, the United States Trustee, and the Debtor, addresses below, on or before March 15, 2024.

NOTICE IS FURTHER GIVEN that if no objections are timely filed, an order may be entered granting the relief requested without further notice or hearing.

NOTICE IS FURTHER GIVEN that if any objections are timely filed, a hearing on the Motion and objections will be scheduled by separate notice.

Dated: February 23, 2024

Respectfully Submitted,

SIMMONS PERRINE MOYER BERGMAN PLC

/s/ Abram V. Carls

Eric W. Lam, AT0004416

Abram V. Carls, AT0011818

115 Third Street SE, Suite 1200

Cedar Rapids, IA 52401

Phone: 319-366-7641

Facsimile: 319-366-1917

elam@simmonsperrine.com

acarls@spliblaw.com

ATTORNEYS FOR KEYSTONE SAVINGS BANK

Addresses:

Chapter 7 Trustee:  
Renee K. Hanrahan  
PO Box 1088  
Cedar Rapids, IA 52406-1088

Trustee's Counsel:  
Elizabeth Lally  
Spencer Fane LLP  
13815 FNB Parkway  
Suite 200  
Omaha, NE 68154

United States Trustee  
111 7<sup>th</sup> Ave. SE, Box 17  
Cedar Rapids, IA 52401

BDC Group, Inc.  
c/o Dennis Bruce RA  
1936 51<sup>st</sup> St. NW  
Cedar Rapids, IA 52402

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 23, 2024, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF System.

The undersigned further certifies that on February 23, 2024, a copy of the foregoing document was served by United States first class mail postage prepaid on the following:

Zayo Group, LLC  
1805 29<sup>th</sup> Street, Suite 2025  
Boulder, Co 80301

Zayo Group, LLC  
c/o Corporation Service Company, RA  
505 5<sup>th</sup> Avenue  
Des Moines, IA 50309

Zayo Group, LLC  
1401 Wynkoop St., Suite 500  
Denver, CO 80202

Zayo Group, LLC  
c/o Corporation Service Company, RA  
1401 Wynkoop St., Suite 500  
Denver, CO 80202

/s/ Abram V. Carls